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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF KRISTEN RENEE
FOURNIER IN SUPPORT OF
ADMINISTRATIVE MOTION TO SEAL**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Kristen Renee Fournier, declare as follows:

2 1. I am an attorney at Kirkland & Ellis, L.L.P., counsel of record for Defendants Uber
3 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”). I offer this Declaration in
4 the above-captioned matter in support of Uber’s Administrative Motion to Seal Certain Materials Attached
5 to the Parties’ Motions to Exclude Experts.

6 2. Counsel for Plaintiffs do not oppose Uber’s proposed redactions.

7 3. Attached as **Exhibit A** is Ex. 1 to Uber’s Motion to Exclude Bruce Weiner (Expert Report
8 of Bruce Weiner) with Uber’s proposed redactions.

9 4. Attached as **Exhibit B** is Ex. 2 to Uber’s Motion to Exclude Bruce Weiner (Deposition of
10 Bruce Weiner) with Uber’s proposed redactions.

11 5. Attached as **Exhibit C** is Ex. 1 to Uber’s Motion to Exclude Cynthia Rando, CHFP (Expert
12 Report of Cynthia Rando, CHFP) with Uber’s proposed redactions.

13 6. Attached as **Exhibit D** is Ex. 1 to Uber’s Motion to Exclude John Chandler, Ph.D. (Expert
14 Report of John Chandler, Ph.D.) with Uber’s proposed redactions.

15 7. Attached as **Exhibit E** is Ex. 4 to Uber’s Motion to Exclude John Chandler, Ph.D. (Rebuttal
16 Expert Report of John Chandler, Ph.D.) with Uber’s proposed redactions.

17 8. Attached as **Exhibit F** is Ex. 7 to Uber’s Motion to Exclude John Chandler, Ph.D. (Rebuttal
18 Report of Victoria Stodden, Ph.D.) with Uber’s proposed redactions.

19 9. Attached as **Exhibit G** is Ex. 8 to Uber’s Motion to Exclude John Chandler, Ph.D. (Incident
20 Report Classification of Dominant Tickets for 2017-2024) with Uber’s proposed redactions.

21 10. Attached as **Exhibit H** is Ex. 1 to Uber’s Motion to Exclude Lacey Keller (Expert Report
22 of Lacey Keller) with Uber’s proposed redactions.

23 11. Attached as **Exhibit I** is Ex. 2 to Uber’s Motion to Exclude Lacey Keller (Deposition of
24 Lacey Keller) with Uber’s proposed redactions.

12. Attached as **Exhibit J** is Ex. 1 to Uber’s Motion to Exclude Thomas R. Tremblay (Expert Report of Thomas R. Tremblay) with Uber’s proposed redactions.¹

13. Attached as **Exhibit K** is Ex. 1 to Uber’s Motion to Exclude Veronique Valliere (Expert Report of Veronique Valliere) with Uber’s proposed redactions.

14. Attached as **Exhibit L** is Ex. 3 to Uber’s Motion to Exclude Veronique Valliere (Deposition of Veronique Valliere) with Uber’s proposed redactions.

15. Attached as **Exhibit M** is Ex. 1 to Uber’s Motion to Exclude Lindsay D. Cameron, Ph.D. (Rebuttal Report of Lindsay D. Cameron, Ph.D.) with Uber’s proposed redactions.

16. Attached as **Exhibit N** is Ex. C to Plaintiffs’ Motion to Exclude Expert Testimony (Redacted Export Report of Vida Thomas) with Uber’s proposed redactions.

17. Attached as **Exhibit O** is Plaintiffs’ Motion to Exclude Expert Testimony with Uber’s proposed redactions.

18. Attached as **Exhibit P** is Ex. B to Plaintiffs’ Motion to Exclude Orchowski (Deposition of Lindsay Orchowski, Ph.D.) with Uber’s proposed redactions.

19. Attached as **Exhibit Q** is the JCCP Court’s Order Granting Uber’s Motion to Enforce the Protective Order.

20. The previous version of the “Every 8 Minutes” ad included the following language in text on the screen: “A sexual crime was reported to Uber almost every eight minutes.” The text on the screen attributed that statement to the *New York Times*’ 8/7/25 article. The audio of the ad also previously stated “Almost every eight minutes a sexual crime was reported to Uber.” This “sexual crime” language was removed from the ad at some point after Uber sent a cease-and-desist letter. The ad previously claimed and continues to claim that “Every eight minutes Uber tries to silence victims.”

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

¹ I understand that Plaintiffs have proposed redactions to Schedule A.1 to the Tremblay Report. Uber does not have any redactions to that portion of the report, and to avoid placing any information that Plaintiffs are seeking to seal on the public record, Uber has removed Schedule A.1 from its filing.

Dated: November 24, 2025

/s/ Kristen Renee Fournier
KRISTEN RENEE FOURNIER